# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF ARKANSAS FAYETTEVILLE DIVISION

Case No.: 5:17-CV-05089-TLB

JILL DILLARD, JESSA SEEWALD, JINGER VUOLO, and JOY DUGGAR,

Plaintiff,

CITY OF SPRINGDALE; WASHINGTON COUNTY; KATHY O'KELLEY; ERNEST CATE; RICK HOYT; STEVE ZEGA; BAUER PUBLISHING COMPANY, L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA GROUP, INC.; BAUER, INC.; HEINRICH BAUER NORTH AMERICA, INC.; BAUER MEDIA GROUP USA, LLC; and DOES 1-10, inclusive,

Defendant.

# PLAINTIFFS' REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to Federal Rule of Evidence 201, Plaintiffs Jill Dillard, Jessa Seewald, Jinger Vuolo, and Joy Forsyth (collectively, "Plaintiffs") hereby request that the Court take judicial notice of the following record referenced in and supporting Plaintiffs' Opposition.

Exhibit 1: A true and correct copy of the Complaint filed in the Circuit Court of Washington County, Arkansas Civil Division, at Fayetteville in *Joshua Duggar v. City of Springdale, Arkansas, and Washington County, Arkansas*, Case No. 72CV-18-668-1. The Court may take judicial notice of this record as said record can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. *Fed R. Evid.* 201(b)(2).

### Respectfully submitted,

# By: /s/ Stephen E. Bledsoe

Stephen G. Larson (admitted pro hac vice) slarson@larsonllp.com
Steve E. Bledsoe (admitted pro hac vice) sbledsoe@larsonllp.com
Jen C. Won (admitted pro hac vice) jwon@larsonllp.com

#### **LARSON LLP**

555 South Flower Street, Suite 4400 Los Angeles, California 90071 Telephone: (213) 436-4888 -Facsimile: (213) 623-2000

Shawn B. Daniels (Ark. Bar No. 99126) *shawn@danielsfirm.com* 

### **DANIELS FIRM**

129 W. Sunbridge Drive Fayetteville, AR 72703

Telephone: (479) 521-7000 - Facsimile: (479) 437-2007

Attorneys for Plaintiffs JILL DILLARD, JESSA SEEWALD, JINGER VUOLO, and JOY FORSYTH